

EXHIBIT B

From: Paula Colbath <pcolbath@loeb.com>
Sent: Wednesday, September 11, 2024 7:34 PM
To: Marc Gottlieb <msg@orllp.legal>; Patrick Murphy <pmurphy@wpdn.net>
Cc: Scott C. Murray <smurray@wpdn.net>; Kari Hartman <khartman@hkwyolaw.com>; Candice Hough <chough@hkwyolaw.com>; slarson@hkwyolaw.com; Alex Inman <ainman@loeb.com>; Sarah Levitan Perry <sperry@loeb.com>; Jane France <jfrance@spkm.org>; Meggan Hathaway <mhathaway@spkm.org>
Subject: Re: 23-CV-79J - BCB v. Bitmain, et al. - proposed Order

Patrick: My clients join in Bit Origin's request for the immediate production of copies of the final settlement agreement, any ancillary documents reflecting side or other agreements, and all documents and communications relating to the discussions/negotiations leading to the settlement agreement and side understandings.

If you do not agree to produce the requested material by a date certain by noon tomorrow (EST) — all of which documents meet the liberal rubric for discovery under FRCP 26, as the documents are highly relevant on the numerous grounds articulated in Mr. Gottlieb's letter (and more), as well as fully protected by the Stipulated Protective Order in place in the action (which would cover any insurance carrier for Bitmain not disclosed in Bitmain's Initial Disclosures) —we will seek an immediate Informal Discovery Conference with the Court and ask to add the documents to our motion to be filed next Tuesday.

Regards,
Paula Colbath

From: Marc Gottlieb <msg@orllp.legal>
Sent: Wednesday, September 11, 2024 6:16:16 PM
To: Patrick Murphy <pmurphy@wpdn.net>
Cc: Khale J. Lenhart <KLenhart@hirstapplegate.com>; Tyson R. Woodford <TWoodford@hirstapplegate.com>; Scott C. Murray <smurray@wpdn.net>; Kari Hartman <khartman@hkwyolaw.com>; Candice Hough <chough@hkwyolaw.com>; slarson@hkwyolaw.com <slarson@hkwyolaw.com>; Paula Colbath <pcolbath@loeb.com>; Alex Inman <ainman@loeb.com>; Sarah Levitan Perry <sperry@loeb.com>; Jane France <jfrance@spkm.org>; Meggan Hathaway <mhathaway@spkm.org>
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CAUTION: EXTERNAL EMAIL

Patrick

Attached please find my letter to you requesting a copy of your client's settlement agreement with the Bitmain Defendants. Notwithstanding your agreement to keep this document confidential, the court cases I've cited from around the country support our right to this material. I urge you to consider my letter and treat it as my effort to meet and confer on this issue. Once you have the opportunity to review these cases, let me know how you intend to proceed. Thank you, Patrick.

Marc

From: Norma J. Hubka <NHubka@hirstapplegate.com>

Sent: Tuesday, September 10, 2024 6:52 PM

To: WyoJudgeABJ@wyd.uscourts.gov

Cc: Khale J. Lenhart <KLenhart@hirstapplegate.com>; Tyson R. Woodford <TWoodford@hirstapplegate.com>; mfeinstein@omm.com; wpao@cooley.com; diden@omm.com; Stutz, Kate <kstutz@omm.com>; Hirsch, Danny <dhirsch@omm.com>; Patrick Murphy <pmurphy@wpdn.net>; Scott C. Murray <smurray@wpdn.net>; Kari Hartman <khartman@hkwyolaw.com>; Candice Hough <chough@hkwyolaw.com>; slarson@hkwyolaw.com; Paula Colbath <pcolbath@loeb.com>; Alex Inman <ainman@loeb.com>; Sarah Levitan Perry <sperry@loeb.com>; Jane France <jfrance@spkm.org>; Megan Hathaway <mhathaway@spkm.org>; Marc Gottlieb <msg@orllp.legal>

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You don't often get email from nhubka@hirstapplegate.com. [Learn why this is important](#)

Attached please find the proposed *Order of Dismissal* for the above-referenced matter in Word format. If you have any questions regarding this, please let me know. Thank you.

Norma J. Hubka ([Bio](#))

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